DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

MOTION OF THE BROOKLYN UNION GAS COMPANY FOR DESIGNATION OF WRITTEN CROSS-EXAMINATION TO OFFICE OF CONSUMER ADVOCATE WITNESS GAIL WILLETTE

Pursuant to Rule 4(A) of the Special Rules of Practice in this proceeding, The Brooklyn Union Gas Company ("Brooklyn Union") hereby designates responses to the following interrogatories as written cross-examination of Office of Consumer Advocate witness, Gail Willette. BUG/OCA-T-400-1-5, 7.

Two copies of each interrogatory response is being submitted to the Commission.

Brooklyn Union intends to conduct oral-cross-examination with respect to the matters covered in these interrogatory responses.

Respectfully submitted,

The Brooklyn Union Gas Company

By:

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Dated: Washington, D.C.

February 10, 1998

Attorneys for

The Brooklyn Union Gas Company

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Dated at Washington, D.C., this 10th day of Jebruary, 1998.

Michael W. Hall